

**DECLARATION OF GREG LANSKY IN SUPPORT OF PLAINTIFF'S MOTION FOR
LEAVE TO SERVE A THIRD-PARTY SUBPOENA PRIOR TO
A RULE 26(F) CONFERENCE**

I, Greg Lansky, do hereby state and declare as follows:

1. I am a member of General Media Systems, LLC, the parent company that owns Strike 3 Holdings, LLC ("Strike 3"). I am the Chief Creative Officer of the Blacked, Tushy, and Vixen adult brands.

2. I have personal knowledge of all of the matters contained in this declaration and, if called and sworn as a witness, I can and competently will testify to all matters contained herein. This declaration is made in support of Plaintiff's Motion for Leave to Take a Third-Party Subpoena Prior to a Rule 26(f) Conference.

3. Strike 3 owns the intellectual property to the Blacked, Tushy, and Vixen adult brands, including the copyrights to each of the movies distributed through Blacked, Tushy and Vixen and the trademarks to each of the brand names and logos. Strike 3 is owned entirely by our company General Media Systems, LLC and has existed since 2015.

4. I moved to the United States in 2006 from Paris, France to pursue my dream of creating art in an adult context. I have always been passionate about photography and cinematography.

5. It was a difficult start - I could barely speak English, and I had trouble making connections and finding employment. I struggled for several years to make a name for myself as a reliable photographer and director.

6. Eventually, after enormous hard work, I was fortunate to be hired by some of the biggest adult brands in the world. Through these experiences, I was able to establish myself and become an expert in the field.

7. In 2013 I decided to risk everything to create my own company and studio. As a director, I felt the industry and I were not offering the best quality and experience possible. I felt I wasn't offering truly inspiring projects for performers to express their art.

8. At the time, the adult market was demoralized and most felt that a high-quality, well produced, subscription based website would never succeed.

9. I can still remember when our company was just three people in my small home office.

10. We kept growing and after a few years our brands turned into a multi-million dollar a year business. We now have 20 million unique visitors to our websites per month and a loyal following.

11. Our company's philosophies are important.

12. We always strive to pay artists and models above other companies. We are known for paying our performers the highest rates ever recorded. We give them the respect they deserve.

13. We focus on delivering superior quality adult films and a wonderful customer experience. People thought we were crazy and that we would fail because no one wanted to pay for expensive quality adult films. Now, we have a loyal customer base.

14. We provide jobs for nearly 60 people worldwide. We provide good benefits including health care coverage and have an extremely positive company culture.

15. Our movies are known for having the highest production budget of any in the industry. We invest in state of the art cinematic equipment. We film with Hollywood industry standards. And, as our subscriber base grows, we always seek to find ways to invest in value for our customers.

16. Because of this, we have a subscriber base that is one of the highest of any adult sites in the world.

17. We are also currently the number one seller of adult DVDs in the United States. No one sells more than us.

18. Our content is licensed throughout the world, including in most major cable networks.

19. Our success has not gone unnoticed. Indeed, we are very proud to state that our unique cinematic films have won many awards. It's humbling. Some of them include:

- Best marketing campaign – company image (AVN, 2016-2017)
- Best new studio (XBIZ, 2017)
- Best cinematography (AVN, 2016)
- Director of the Year (AVN, 2016-2017; XBIZ, 2017)
- Best membership website (AVN, 2016-2017)
- Adult site of the year – (XBIZ, 2015-2017)

20. We also are routinely featured in the mainstream media. Just in the past few months, Forbes,¹ The Daily Beast,² and CBC Radio³ have all done major profiles on us.

21. We are proud of our impact on the industry. We have raised the bar - leading more adult studios to invest in better content, higher pay for performers, and to treat each performer like an artist. That's a testament to the entire team and the movies we create.

22. Unfortunately, piracy is a major threat to our company. We can compete in the industry, but we cannot compete when our content is offered for free.

¹ "How One Pornographer is Trying to Elevate Porn to Art," *Forbes* July 20, 2017 <https://www.forbes.com/sites/susannahbreslin/2017/07/20/pornographer-greg-lansky-interview/#2301d3ae6593>

² "Meet the Man Making Porn Great Again," *The Daily Beast*, February 18, 2017 <http://www.thedailybeast.com/meet-the-man-making-porn-great-again>

³ "Porn-o-nomics: How one director is making a fortune by defying conventional wisdom," *CBC Radio*, February 24, 2017 <http://www.cbc.ca/radio/day6/episode-326-sanctuary-cities-la-la-land-vs-jazz-hollywood-in-china-porn-o-nomics-and-more-1.3994160/porn-o-nomics-how-one-director-is-making-a-fortune-by-defying-conventional-wisdom-1.3994167>

23. We have discovered that when we put videos online for paid members it takes as little as four minutes to be on torrent websites. We have attempted to identify the initial seeder but have found it impossible with the large volume of our subscriber base.

24. We put our hearts and minds and sweat and blood into creating valuable content for our paid customers. It crushes us to see it available to anyone for free in just minutes.

25. We are undeniably the most pirated adult content in the world.

26. We send on average 50,000 DMCA notices a month but it does nothing to stop the infringement.

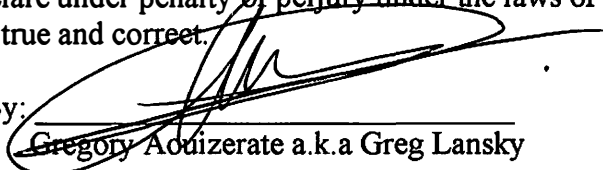
27. The only way to stop the piracy of our movies on BitTorrent networks is to file lawsuits like this one.

28. In order to continue to provide value for our members, exciting and inspiring projects for adult performers, and to continue to create jobs and growth in our community, we must protect our copyrights.

DECLARATION

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

By:


Gregory Aduizerate a.k.a Greg Lansky